

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

VIRTAMOVE, CORP.,	§	Case No. 2:24-cv-00093-JRG
	§	(Lead Case)
Plaintiff,	§	
	§	
v.	§	<b>JURY TRIAL DEMANDED</b>
	§	
HEWLETT PACKARD ENTERPRISE	§	
COMPANY,	§	
	§	
Defendant.	§	

---

VIRTAMOVE, CORP.,	§	Case No. 2:24-cv-00064-JRG
	§	(Member Case)
Plaintiff,	§	
	§	
v.	§	<b>JURY TRIAL DEMANDED</b>
	§	
INTERNATIONAL BUSINESS	§	
MACHINES CORP.,	§	
	§	
Defendant.	§	

**UNOPPOSED MOTION FOR LEAVE TO CONDUCT THE SECOND DAY OF DR.  
KOSKINEN’S DEPOSITION ON JULY 25, 2025**

Defendant International Business Machines Corp. (“IBM”) respectfully moves the Court for leave to conduct the second day of the expert deposition of VirtaMove’s technical expert, Dr. Eric Koskinen, after the close of expert discovery deadline on July 25.

The expert discovery deadline is July 18, 2025, and the deposition of Dr. Koskinen was originally scheduled for July 17 and 18, 2025. Due to scheduling conflict issues resulting from multiple concurrent depositions on the same dates, the parties and the witness agreed to conduct the second day of Dr. Koskinen’s deposition on July 25, 2025, as laid out below. Plaintiff and Defendant have agreed to the following depositions (the timing of which neither party opposes):

Deponent	Date
Dr. Eric Koskinen	July 25, 2025 (second day)

In this motion, Counsel for the parties have conferred and all parties stipulate to the foregoing limited discovery. IBM is not seeking leave for purposes of delay.

Dated: July 17, 2025

Respectfully submitted,

/s/ Nate Ngerebara

Todd M. Friedman (*pro hac vice*)  
KIRKLAND & ELLIS LLP  
601 Lexington Avenue  
New York, NY 10022  
Telephone: (212) 446-4800  
Facsimile: (212) 446-4900  
Email: todd.friedman@kirkland.com

Brandon H. Brown  
State Bar No. 266347  
Nate Ngerebara (*pro hac vice*)  
KIRKLAND & ELLIS LLP  
555 California Street  
San Francisco, CA 94104  
Telephone: (415) 439-1400  
Facsimile: (415) 439-1500  
Email: brandon.brown@kirkland.com

*Of Counsel:*

Andrea L. Fair  
Texas State Bar No. 24078488  
Email: andrea@wsfirm.com  
WARD, SMITH & HILL, PLLC  
1507 Bill Owens Parkway  
Longview, TX 75604  
(903) 757-6400 (telephone)  
(903) 757-2323 (facsimile)

*Attorneys for Defendant  
International Business Machines Corp.*

**CERTIFICATE OF CONFERENCE**

The undersigned certifies that counsel for Defendant conferred with counsel for Plaintiff, and this motion is unopposed.

/s/ Nate Ngerebara  
Nate Ngerebara

**CERTIFICATE OF SERVICE**

The undersigned certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document on July 17, 2025.

/s/ Nate Ngerebara  
Nate Ngerebara